

EXHIBIT B



Allauna Gluski <allauna@lloydmousilli.com>

Fwd: Meet and confer re discovery deficiencies

19 messages

William Shibley <william@lloydmousilli.com>

Tue, May 14, 2024 at 1:19 PM

To: Rachel Crockett <rachel@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Sent from my phone.

----- Forwarded message -----

From: **Nico Banks** <nico@bankslawoffice.com>

Date: Tue, May 14, 2024, 9:40 AM

Subject: Meet and confer re discovery deficiencies

To: William Shibley <william@lloydmousilli.com>

Cc: Josh Stein <josh.stein.esq@gmail.com>, richard nerviglaw.com <richard@nerviglaw.com>

Mr. Shibley

Also, please consider this our final meet-and-confer regarding the discovery deficiencies we discussed last week. If those are not resolved within the next 48 hours, I plan to file a motion for sanctions or contempt (unless you provide an explanation for why something is not feasible to resolve in the next 48 hours, and you resolve everything that is feasible).

If you confirm that the tax returns you produced are the same as the ones that were filed with the IRS, then I'm willing to drop the signatures issue. But, the other tax return deficiencies remain outstanding, along with the interrogatory response deficiencies.

Regards,

Nico Banks, Esq.
Banks Law Office, P.C.
Pronouns: he/him
Tel.: 971-678-0036
712 H St NE,
Unit #8571,
Washington, DC 20002

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On Tue, May 14, 2024 at 9:04 AM Nico Banks <nico@bankslawoffice.com> wrote:

Mr. Shibley,

Could we agree to postpone the hearing on the motion to compel arbitration and the motion to dismiss? That way, you could re-write and submit your motions in light of our amendments to the pleadings, as discussed yesterday. Our position is that the current motions would be moot in light of the amendments to the pleadings. I'm happy to discuss this further.

Regards,

Nico Banks, Esq.
Banks Law Office, P.C.
Pronouns: he/him

Tel.: 971-678-0036
712 H St NE,
Unit #8571,
Washington, DC 20002

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William Shibley <william@lloydmousilli.com>

Wed, May 15, 2024 at 11:52 AM

To: Nico Banks <nico@bankslawoffice.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Attached find my response.

[Quoted text hidden]

 **Letter to Nico Banks regarding further responses.wpd**
136K

Nico Banks <nico@bankslawoffice.com>

Wed, May 15, 2024 at 2:28 PM

To: William Shibley <william@lloydmousilli.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Mr. Shibley,

You received all of the correspondence about the discovery deficiencies. For convenience, though, here are email threads that list the discovery deficiencies.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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[Quoted text hidden]

----- Forwarded message -----

From: Nico Banks <nico@bankslawoffice.com>

To: Allauna Gluski <allauna@lloydmousilli.com>

Cc: Feras Mousilli <feras@lloydmousilli.com>, Lema Mousilli <lema@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, William Shibley <william@lloydmousilli.com>, richard@nerviglaw.com

Bcc:

Date: Wed, 15 May 2024 10:07:12 -0400

Subject: Re: Hough, et al v. Carroll, et al - Jurisdictional Defendants' Responses to Interrogatory

We also need the account institutions and account numbers for any bank accounts disclosed. E.g., Ryan Carroll's Dreams to Reality LLC bank account and other missing bank account names and account numbers by EOD tomorrow.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

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[Washington, DC 20002](#)

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On Sun, May 12, 2024 at 8:54 AM Nico Banks <nico@bankslawoffice.com> wrote:

Some initial comments and questions:

The PDFs you produced exclude a lot of information. Please immediately either disclose the native spreadsheets or disclose PDFs that do not cut off the cells.

Why don't Michael Day's disclosures include WWKB's assets, given that he owns and controls that company?

Several of the entities only show the "peak value" of assets and do not have a column for "current value." Please fix that immediately.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

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Unit #8571,
Washington, DC 20002

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On Sun, May 12, 2024 at 1:55 AM Allauna Gluski <allauna@lloydmousilli.com> wrote:
Counsel,

Please see attached:

Max K. Day's Response to Interrogatory and Ex. A
Max O. Day's Response to Interrogatory and Ex. A
Michael E. Day 's Response to Interrogatory and Ex. A
Ryan Carroll 's Response to Interrogatory and Ex. A
Precision Trading Group LLC 's Response to Interrogatory and Ex. A
WA Distribution LLC 's Response to Interrogatory and Ex. A
Yax Ecommerce d/b/a Wealth Assistants 's Response to Interrogatory and Ex. A

Best Regards,
Allauna Gluski, Litigation Paralegal
Lloyd & Mousilli - Attorneys & Counselors at Law
Main: 512.609.0059 Direct: 281.832.0674
www.lloydmousilli.com

Attention: For efficient case management, please include case names in the email subject line and carbon copy litigation@lloydmousilli.com as well as the lead attorney on all emails.

----- Forwarded message -----

From: Nico Banks <nico@bankslawoffice.com>
To: Megan Weiss <megan@lloydmousilli.com>
Cc: Allauna Gluski <allauna@lloydmousilli.com>, Lema Mousilli <lema@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, William Shibley <william@lloydmousilli.com>, richard@nerviglaw.com
Bcc:
Date: Sat, 11 May 2024 10:45:55 -0400
Subject: Re: Hough, et al v. Carroll, et al - 5/8 Disclosures
I don't believe we have a page bates stamped 366. It looks to me like the production ends at 365.

Nico Banks, Esq.
Banks Law Office, P.C.
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On Sat, May 11, 2024 at 10:35 AM Megan Weiss <megan@lloydmousilli.com> wrote:
Please see JD0000366, which is a letter from TaxCite.

Thank you,

Megan Weiss, Head of Operations
Lloyd & Mousilli - Attorneys & Counselors at Law
Main: 512.609.0059 Direct: 507.459.0385
www.lloydmousilli.com

On Sat, May 11, 2024 at 9:30 AM Nico Banks <nico@bankslawoffice.com> wrote:

It looks to me like Bates JD000336 is just the beginning page of Carroll's 2023 tax return. Is there another page that says what you said was on that page (ie an affirmation that the missing tax returns for Carroll and WA Distribution do not exist)?

Nico Banks, Esq.
Banks Law Office, P.C.
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[Washington, DC 20002](#)

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On Thu, May 9, 2024 at 9:13 PM Megan Weiss <megan@lloydmousilli.com> wrote:

Mr. Banks,

Please see attached correspondence on behalf of Mr. Shibley.

Thank you,

Megan Weiss, Head of Operations
Lloyd & Mousilli - Attorneys & Counselors at Law
Main: 512.609.0059 Direct: 507.459.0385
www.lloydmousilli.com

On Thu, May 9, 2024 at 1:57 PM Nico Banks <nico@bankslawoffice.com> wrote:

The Precision Trading Group tax returns are also unsigned. And it appears to me that a lot of numbers are missing from Precision Trading Group's Form 4562 for its 2022 tax return (e.g., column G in section B -- see page 11 of the return) but I'm open to being wrong about that.

Thanks,

Nico Banks, Esq.
Banks Law Office, P.C.
Pronouns: he/him
Tel.: 971-678-0036
[712 H St NE,](#)
[Unit #8571,](#)

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On Thu, May 9, 2024 at 2:03 PM Nico Banks <nico@bankslawoffice.com> wrote:

Also, Michael Day's declaration does not provide a reasonable excuse for failing to provide the 2022 tax return. It appears that Michael Day used a service called Executive Management Solutions, Inc. to prepare the tax returns. They would be able to provide the 2022 tax return.

Also, Max K. Day's 2022 unsigned return indicates that there was a previous return filed for that year, and the one you sent me is a corrected version. Please produce the previously filed version as well.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

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On Thu, May 9, 2024 at 12:19 PM Nico Banks <nico@bankslawoffice.com> wrote:

I realized that the 2022 Yax Ecommerce tax return goes through September of 2023, so there is no need to correct that as long as Yax Ecommerce has filed no other tax returns (although it is strange that both the 2021 and 2022 tax returns were signed only a few days ago). But the other deficiencies remain.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

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Washington, DC 20002

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On Thu, May 9, 2024 at 11:58 AM Nico Banks <nico@bankslawoffice.com> wrote:

Hello,

Thank you for the production.

However, there are a few deficiencies that jump out right away:

- They're overly redacted. For example, you have to at least leave the last four digits of social security numbers and EINs, and you can't redact company names, for example.
- Ryan Carroll's 2023 tax return is missing.
- Yax Ecommerce's 2023 tax return is missing.
- There are no tax returns for WA Distribution LLC
- Michael Day's, Max O. Day's, and Max K. Day's tax returns appear to be unsigned, at least at first glance.

Please fix those deficiencies as soon as possible. We especially need the improper redactions fixed right away.

Also, we'll agree to the protective order.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

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Washington, DC 20002

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On Wed, May 8, 2024 at 11:30 PM Allauna Gluski <allauna@lloydmousilli.com> wrote:
Counsel,

Please see all attached.

Best Regards,
Allauna Gluski, Litigation Paralegal
Lloyd & Mousilli - Attorneys & Counselors at Law
Main: 512.609.0059 Direct: 281.832.0674
www.lloydmousilli.com

Attention: For efficient case management, please include case names in the email subject line and carbon copy litigation@lloydmousilli.com as well as the lead attorney on all emails.

2 attachments

-  **Re: Hough, et al v. Carroll, et al - Jurisdictional Defendants' Responses to Interrogatory.eml**
13K
-  **Re: Hough, et al v. Carroll, et al - 5/8 Disclosures.eml**
40K

William Shibley <william@lloydmousilli.com>

Wed, May 15, 2024 at 4:37 PM

To: Nico Banks <nico@bankslawoffice.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss

<megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Mr. Banks,

I have reviewed the email chains and am still uncertain exactly what you want.

I noticed that in the past you have used bullet points to identify your concerns. If you could just give me a list so that I can have the staff in Texas attempt to obtain everything that you want. Because I am still uncertain as to exactly what information you wish, I would appreciate your setting it forth in one or two paragraphs or as a letter with bullet points.

Under the Federal Rules, discovery is a continuing obligation so that we will continue to update information as it is discovered.

If you make a motion that is what you will need to do. You would need to explicitly set forth what you claim we have failed to provide under your discovery requests.

William Shibley
[Quoted text hidden]

Nico Banks <nico@bankslawoffice.com>
To: William Shibley <william@lloydmousilli.com>

Wed, May 15, 2024 at 4:53 PM

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

I disagree; the email threads describe the deficiencies with plenty of particularity. Also, please consider this our meet and confer regarding an ex parte motion for a continuance as to the motion to compel arbitration and motion to dismiss for lack of personal jurisdiction. I understand based on your previous email that you oppose it, but if not, please let me know right away.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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[Quoted text hidden]

William Shibley <william@lloydmousilli.com>

Wed, May 15, 2024 at 8:20 PM

To: Nico Banks <nico@bankslawoffice.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Although I am still uncertain as to what you actually want in responses to discovery, I have asked the Texas attorneys to review and respond further. It still may take a few days for them to obtain that information and respond.

It would simplify matters for all parties involved if you would provide a specific list of what you claim the inadequacies are.

Bill Shibley

[Quoted text hidden]

Nico Banks <nico@bankslawoffice.com>

Wed, May 15, 2024 at 8:22 PM

To: William Shibley <william@lloydmousilli.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

We're at an impasse. I've shown plenty of patience regarding these urgent discovery matters, and I plan to move for sanctions now.

Regards,

Nico Banks, Esq.
Banks Law Office, P.C.
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Tel.: 971-678-0036
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[Quoted text hidden]

William Shibley <william@lloydmousilli.com> Wed, May 15, 2024 at 9:37 PM
To: Nico Banks <nico@bankslawoffice.com>
Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

There is no impasse. I have only asked you to clarify exactly what you want. We are very willing to review all of our client's prior responses to provide the information which you believe has not been provided. I have reviewed your emails along with our responses, and I still am unsure what you want.. All I ask is for a simple list of what you claim was insufficient. Were you to make a discovery motion, you would be required to set forth specifically what you want and what you contend was not provided.

Sincerely

William H. Shibley
[Quoted text hidden]

William Shibley <william@lloydmousilli.com> Thu, May 16, 2024 at 11:24 AM
To: Nico Banks <nico@bankslawoffice.com>
Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Nico,

I have heard from the Texas team members and we propose a conference with you to discuss and hopefully resolve the discovery issues in this matter. The available time is tomorrow Friday between 2 pm and 6 pm central time (12 noon and 4 pm pacific time.

William Shibley
[Quoted text hidden]

Nico Banks <nico@bankslawoffice.com> Thu, May 16, 2024 at 11:43 AM
To: William Shibley <william@lloydmousilli.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

All,

I asked you to take basic steps to comply with your long-overdue and urgent discovery obligations, and you failed to do. So, I'm going to move for sanctions. I'm willing to have a call tomorrow to discuss what those sanctions should be. Tomorrow at 12pm pacific time works for me. Please call me at 971-678-0036.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

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Washington, DC 20002

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[Quoted text hidden]

William Shibley <william@lloydmousilli.com>

Thu, May 16, 2024 at 1:07 PM

To: Nico Banks <nico@bankslawoffice.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

I am shocked. We are trying to resolve your issues with discovery and you simply want to strike out. We are scheduling a video conference tomorrow at noon Pacific Time (2 pm Central Time). I look forward to speaking with you at that time.

William Shibley

[Quoted text hidden]

William Shibley <william@lloydmousilli.com>

Thu, May 16, 2024 at 1:12 PM

To: Nico Banks <nico@bankslawoffice.com>

Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Our agenda for tomorrow includes a discussion regarding your alleged deficiencies with our clients' discovery responses.

You will receive a calendar link with meeting details for the agreed time.

Thank you.

William Shibley
[Quoted text hidden]

Nico Banks <nico@bankslawoffice.com> Thu, May 16, 2024 at 4:36 PM
To: William Shibley <william@lloydmousilli.com>
Cc: Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

Please also include Joshua Stein and Richard Nervig on the calendar invitation. More generally, please copy them on correspondence to me.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

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Washington, DC 20002

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[Quoted text hidden]

Megan Weiss <megan@lloydmousilli.com> Fri, May 17, 2024 at 8:31 AM
To: Nico Banks <nico@bankslawoffice.com>
Cc: William Shibley <william@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

Good morning,

A calendar invite with video conference information has been circulated.

However, Mr. Stein has not been included at this time.

The email provided is a personal email, so it does not state a law firm affiliation, and I am unsure of his relationship to the parties.

Please advise as to Mr. Stein's role in the case and parties he is appearing on behalf of.

Thank you,

Megan Weiss, Head of Operations
Lloyd & Mousilli - Attorneys & Counselors at Law
Main: 512.609.0059 Direct: 507.459.0385
www.lloydmousilli.com

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Nico Banks <nico@bankslawoffice.com> Fri, May 17, 2024 at 8:34 AM
To: Megan Weiss <megan@lloydmousilli.com>
Cc: William Shibley <william@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

He is lead counsel for Plaintiffs in the Texas matter -- Wealth Assistants v. Thread Bank.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

[Washington, DC 20002](#)

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Josh Stein <josh.stein.esq@gmail.com> Fri, May 17, 2024 at 8:34 AM
To: Megan Weiss <megan@lloydmousilli.com>
Cc: Nico Banks <nico@bankslawoffice.com>, William Shibley <william@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>

I am a lawyer working with Nico Banks. I use this email address for all business. If you're uncomfortable sending a link to a Gmail address, send it to Josh@JoshSteinLaw.com which forwards to my Gmail address

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Nico Banks <nico@bankslawoffice.com> Fri, May 17, 2024 at 8:35 AM
To: Megan Weiss <megan@lloydmousilli.com>

Cc: William Shibley <william@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

Actually, he's lead counsel for Intervenorors

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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William Shibley <william@lloydmousilli.com> Fri, May 17, 2024 at 9:45 AM
To: Nico Banks <nico@bankslawoffice.com>
Cc: Megan Weiss <megan@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

Nico,

I object to Mr. Stein's presence. I can understand why you wish to have Mr. Stein present in our discovery meeting, but he is party to an unrelated case, and his issues are not part of our proceedings. Unless and until that matter is joined with proceeding, which is unlikely, I do not believe that he should be in this meeting and I object to his presence. If at some point he becomes counsel of record in this matter, he would have some standing, but we are trying to resolve your discovery issues, and his presence would be deleterious to our attempting to resolve discovery issues.

William Shibley
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Nico Banks <nico@bankslawoffice.com> Fri, May 17, 2024 at 9:57 AM
To: William Shibley <william@lloydmousilli.com>
Cc: Megan Weiss <megan@lloydmousilli.com>, Allauna Gluski <allauna@lloydmousilli.com>, Feras Mousilli <feras@lloydmousilli.com>, Rachel Crockett <rachel@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

Mr. Shibley,

6/7/24, 9:28 PM
I disagree with your objection, in part because Defendants have included attorneys who are not counsel-of-record in all of our communications. But, this isn't the hill we want to die on, so Mr. Stein will not attend the meeting.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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May 15, 2024

Via Electronic Mail

Nico Banks
Banks Law Office
712 H St. NE,
Unit #8571,
Washington, DC 20002
nico@bankslawoffice.com

Re: Meet and Confer

Mr. Banks,

I have reviewed your request email and I am somewhat concerned. I was not a party to your prior discussions. I am uncertain as to the nature of your request for further response. Please set forth "the discovery deficiencies we discussed last week." We will attempt to resolve all discovery issues, but I must ask you to specify exactly what those deficiencies are. In this regard, I consider your letter at best ambiguous.

As to the tax returns, it is my understanding that those are true and correct copies of the returns which have been filed. I am again uncertain what you mean by "the other tax return deficiencies remain outstanding." Please specify exactly what you mean, and we will do our best to resolve those issues.

As you are aware, the clients are in Texas as are the balance of the staff and attorneys. If you would set forth each deficiencies which you believe exist, we will address them.

If a court finds that there are no deficiencies, the court could impose those sanctions on you and/or your clients.

Sincerely,,

Lloyd & Mousilli
Attorneys at Law

William Shibley